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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 CASE NO. 1:21-CR-00024-NONE-SKO

12 Plaintiff,

13 v.  
14 **STIPULATION BETWEEN THE PARTIES**  
15 **REGARDING PROTECTED INFORMATION**

16 MARQUIS ASAAD HOOPER and  
17 NATASHA RENEE CHALK

18 Defendants.  
19

20 WHEREAS, the discovery in this case contains a large amount of personal information including  
21 but not limited to, confidential communications between members of the Navy, numerous individuals'  
22 personal identifying information—including names, addresses, social security numbers, and phone  
23 numbers—, various individuals' financial information including bank statements, and other nonpublic  
24 documents ("Protected Information"); and

25 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the  
26 unauthorized disclosure or dissemination of this information to anyone not a party to the court  
proceedings in this matter;

27 The parties agree that entry of a stipulated protective order is appropriate.  
28

1 THEREFORE, defendants MARQUIS ASAAD HOOPER and NATASHA RENEE CHALK, by  
2 and through their counsels of record (“Defense Counsels”), and plaintiff the UNITED STATES, by and  
3 through its counsel of record, hereby agree and stipulate as follows:

4 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
5 Criminal Procedure, and its general supervisory authority.

6 2. This Order pertains to all discovery provided to or made available to either Defense  
7 Counsel as part of discovery in this case (hereafter, collectively known as “the discovery”).

8 3. By signing this Stipulation, each Defense Counsel agrees not to share any documents that  
9 contain Protected Information with anyone other than Defense Counsel and designated defense  
10 investigators and support staff. Each Defense Counsel may permit the defendant to view unredacted  
11 documents in the presence of their attorneys, defense investigators, and support staff. The parties agree  
12 that each Defense Counsel, defense investigators, and support staff shall not allow the defendants to  
13 copy Protected Information contained in the discovery. The parties agree that each Defense Counsel,  
14 defense investigators, and support staff may provide the defendants with copies of documents from  
15 which Protected Information has been redacted.

16 4. The discovery and information therein may be used only in connection with the litigation  
17 of this case and for no other purpose. The discovery is now and will forever remain the property of the  
18 Government. Each Defense Counsel will return the discovery to the Government or certify that it has  
19 been destroyed at the conclusion of the case.

20 5. Each Defense Counsel will store the discovery in a secure place and will use reasonable  
21 care to ensure that it is not disclosed to third persons in violation of this agreement.

22 6. Each Defense Counsel shall be responsible for advising the defendant, as well as each  
23 Defense Counsel’s employees, other members of the defense team, and defense witnesses, of the  
24 contents of this Stipulation and Order.

1       7. In the event that either defendant substitutes counsel, that defendant's Defense Counsel  
2 agrees to withhold discovery from any new counsel unless and until substituted counsel agrees also to be  
3 bound by this Stipulation and Order.

4       IT IS SO STIPULATED.

5  
6 DATED: February 8, 2021

7  
8       \_\_\_\_\_  
9       */s/ Michael McKneely* \_\_\_\_\_  
10       MICHAEL MCKNEELY  
11       COUNSEL FOR MARQUIS ASAAD HOOPER

12       \_\_\_\_\_  
13       */s/ Benjamin Gerson* \_\_\_\_\_  
14       BENJAMIN GERSON  
15       COUNSEL FOR NATASHA RENEE CHALK

16       \_\_\_\_\_  
17       */s/ Vincente A. Tennerelli* \_\_\_\_\_  
18       VINCENTE A. TENNERELLI  
19       COUNSEL FOR UNITED STATES

20  
21       **ORDER**

22 IT IS SO ORDERED.

23 Dated: February 9, 2021

24       \_\_\_\_\_  
25       */s/ Sheila K. Oberlo* \_\_\_\_\_  
26       UNITED STATES MAGISTRATE JUDGE  
27  
28